Division VIII of Title 5 of the California Code of Regulations

Proposed Amendments to Title 5 of the California Code of Regulations Pertaining to Adding a Teaching or Content Area to a General Education Teaching Credential

Initial Statement of Reasons

Rationale for Proposed Regulations
The proposed amendments implement, interpret, and make specific Education Code sections 44225(e), 44274.2 and 44399.1 pertaining to adding a new teaching or content area to an existing general education teaching credential.

This rulemaking action proposes amendments to Title 5 of the California Code of Regulations (CCR) related to adding a teaching or content area to a general education teaching credential as approved by the Commission at the March 2013 meeting. The proposed amendments also include general clean-up of the regulation section.

General Provisions Governing Adding a Teaching or Content Area
5 CCR section 80499 allows a California credentialed teacher to add a teaching or content area to an existing general education teaching credential without completing the full professional preparation program for the new content area or credential type.

Requirements for earning a Multiple or Single Subject Credential have changed since the last update to this section of regulations in 2000. As a result, the regulation section is no longer consistent with current credential requirements. Several key policy questions related to this issue were discussed at the August 2012 (http://www.ctc.ca.gov/commission/agendas/2012-08/2012-08-5D.pdf) and January 2013 (http://www.ctc.ca.gov/commission/agendas/2013-01/2013-01-3B.pdf) Commission meetings including the results of a survey of stakeholders on the pertinent issues raised. At the March 2013 Commission meeting (http://www.ctc.ca.gov/commission/agendas/2013-03/2013-03-2A.pdf), Commissioners provided staff direction on amendments to the Title 5 regulations.

Pedagogy Requirement
A pedagogy course must be completed when an individual is adding a Multiple Subject Credential while holding a Single Subject Credential and vice versa. To obtain the Single Subject Credential, the course must be a departmentalized pedagogy course but regulations do not specify that the departmentalized course be in the content area of the new Single Subject Credential. Current regulations also do not require the holder of a Single Subject Credential adding a new single subject content area to complete a pedagogy course in the content area to be added.

The Commission took action to require that the pedagogy course used to add a content area must align with the specific content area requested for both Multiple and Single Subject Credential holders seeking to add a new credential type or content area.
There are several content areas including science and mathematics in which there is only one pedagogy course in Commission-approved programs for all subject areas within the broad content area. For example, a teacher completing the pedagogy course for a credential in biology would already have satisfied the pedagogy requirement if adding the content area of chemistry. The Commission discussed this question and determined that the Single Subject Credential holder adding a new subject area that falls within the same broad content area would not need to complete additional pedagogy coursework. In addition, Commissioners agreed that a Commission-approved program sponsor could grant an equivalency for coursework completed at their institution for candidates seeking to meet the pedagogy requirement.

*Where the Pedagogy Course is Completed*

Some California institutions have developed “generic” pedagogy courses for individuals to use to earn another general education credential via Title 5 section 80499 provisions although these institutions do not have a Commission-approved preparation program for the type of credential being sought. These stand-alone courses have not been reviewed by the Commission because they are not part of an accredited preparation program. Thus, these stand-alone courses may not align with current Commission program standards.

The Commission took action to accept pedagogy courses completed in California only if the institution has a Commission-approved program for the credential type or content area sought. The Commission further moved to accept pedagogy courses from states outside of California if these courses were completed at a regionally-accredited institution that sponsors a professional teacher preparation program.

*Reading/RICA Requirement*

California-prepared Multiple and Single Subject Credential holders complete a self-contained or departmentalized reading course, as appropriate to the credential type, within their preliminary preparation program. In addition, effective October 1, 1998, passage of the Reading Instruction Competency Assessment (RICA) is also required for Multiple Subject Credential candidates. Currently, the holder of a Single Subject Credential seeking a Multiple Subject Credential must complete either the beginning reading requirement or pass the RICA.

The Commission took action to require that Single Subject Credential holders complete both the reading course and pass the RICA if seeking to earn a Multiple Subject Credential.

*English Learner Requirement*

Some individuals using 5 CCR section 80499 to qualify for a new content area or a new credential type do not hold an English Learner Authorization (ELA). The ELA requirement is not currently in 5 CCR section 80499. Therefore, credential holders are not currently required to earn an ELA to use the provisions of 5 CCR section 80499.

The Commission took action that all individuals earning a teaching credential or new content area using the 5 CCR section 80499 provision complete the requirements for earning an English Learner Authorization.
Senate Bill (SB) 941 - National Board Certification (NBC)
Senate Bill (SB) 941 (Chap. 348, Stats. 2011), effective January 1, 2012, added Education Code section 44399.1 which allows individuals to earn an additional credential or add a content area to a general education teaching credential based on NBC. Previous to this change in statute, holders of Multiple or Single Subject Credentials wishing to add another content area or credential type who earned NBC in a new content area or credential type were required to complete subject-matter competence and other requirements.

Current statute allows the Commission to determine if an individual earning a credential using this new option must also satisfy subject-matter competence by examination to comply with the federal No Child Left Behind (NCLB) Act. While SB 941 was going through the legislative process, Commission staff consulted with the California Department of Education, the California agency responsible for NCLB Compliance. While working with the United States Department of Education, it was determined that the Commission through the California Department of Education would need to apply to the United States Department of Education for a waiver of the examination requirement based on the submission of a thorough analysis of the content of the NBC assessments.

Therefore, holders of a Single Subject Credential, or previously issued equivalent general education teaching credential, earning a Multiple Subject Credential based on NBC using this new option must pass the California Subject Examination for Teachers (CSET): Multiple Subjects examination.

Out-of-State Credentials
Statute specifies the requirements for issuance of credentials to out-of-state (OOS) credentialed teachers. The most recent change in statute was the passage of SB 1209 (Chap. 517, Stats. 2006), which amended Education Code section 44274.2 to allow possession of a full credential earned in a state or U.S. territory outside of California to be used to obtain a comparable California credential.

Some California-prepared Multiple or Single Subject Credential holders subsequently earn an OOS credential and want to add that authorization to their California credential. Currently, these individuals are evaluated as OOS-prepared teachers under the provisions of SB 1209 because they hold an OOS credential. This could result in only a preliminary credential being issued to the holder of a California clear credential. If these individuals hold a clear Multiple or Single Subject Credential, they have already met the clear credential requirements and should not need to complete additional requirements except for the ELA requirement if not previously met. If the individual holds a California preliminary credential, he/she should only need to meet the renewal requirements listed on his/her current credential and not additional requirements.

Two options that would allow possession of a professional level teaching credential issued by another state or U.S. Territory to meet the requirement to add a teaching credential or content area are included in the proposed regulations:

1) For a Single Subject Credential, an OOS credential with a departmentalized classroom teaching authorization that is comparable to a content area currently issued in California, or
2) For a Multiple Subject Credential, an OOS credential with an elementary education or self-contained classroom teaching authorization.

Non-Substantive Changes
There are non-substantive changes that need to be included in 5 CCR section 80499 such as to remove all references to “professional” clear credentials and change the title of the section to better reflect the substance of the regulations. In addition, the option to verify subject-matter competence by completion of a subject-matter program when seeking a Multiple Subject Credential needs to be deleted to align the section with No Child Left Behind.

Proposed Amendments to Regulations
§80499
Title: Proposes changing the title to more accurately reflect the content of the regulations.

(a): Proposes changing “authorization” to “teaching or content area” to more accurately describe the item to be added. Proposes removal of “by recommendation of an institution approved by the Commission to recommend for the authorization, or may apply” as institutions may only recommend for credentials whereby an individual completes an approved program. Added (g), (h), and (i) as subsections with new options. Removed and added “,” and “or” to complete sentence.

(b): Proposes change to “Section” for consistency. Deletes “, valid” and adds “that has not yet expired” to clarify the definition.

(c): Amendments to EC §44277 removed professional growth activities and successful service as renewal requirements for professional clear teaching credentials. As a result, the Commission discontinued issuance of “professional” clear credentials effective January 1, 2007. Proposes removal of “or professional clear” since professional clear credentials are no longer issued. Removed “,” and added “or” to complete sentence. Changed “authorization” to “content area” to more accurately describe the item to be added. Added “successful completion of” since additional requirements are added and removed “either”.

(c)(1): Proposes changing “both” to “all” as there is an additional subsection.

(c)(1)(A): Propose changing “completion” to “passage” since a passing score on exams must be achieved. Added “completion of” for subject matter program. Removed “and” as adding an additional subsection.

(c)(1)(B): Proposed amendments to add the requirement of a pedagogy course in the specific content area to align more closely with current Commission-approved preparation program standards. Pedagogy courses from California institutions shall be accepted only if the institution has a Commission-approved program for the content area sought. Additional proposed language allows Commission-approved programs to grant equivalency to the pedagogy requirement for coursework completed at their institution to reduce the possibility of redundancy. States that pedagogy courses from outside of California shall only be accepted from regionally-accredited institutions as long as the courses are associated with a professional teacher preparation program.
approved by the state in which they were completed. Removed “.” and added “, and” to allow for the addition of another subsection.

(c)(1)(C): Proposed new subsection to require individuals using the provisions of this section to hold an English Learner Authorization as found in Education Code Section 44253.3 or 44259.5.

(c)(2)(A): Proposes changing “completion” to “passage” since a passing score on exams must be achieved. Removed “either” to correct sentence. Removed “,” and “a Commission-approved subject-matter program” as this option is no longer available to obtain the Multiple Subject Credential due to No Child Left Behind and aligned with Title 5 section 6102.

(c)(2)(B): Proposes the addition of language stating that pedagogy courses from California institutions shall be accepted only if the institution has a Commission-approved Multiple Subject preparation program. Additional proposed language states that pedagogy courses from outside of California shall only be accepted from regionally-accredited institutions as long as the courses are associated with a professional teacher preparation program approved by the state in which they were completed. Proposes eliminating the word “and” to allow for the addition of another subsection.

(c)(2)(C): Proposes changing “may” to “shall” to remove ambiguity regarding the requirement. Proposed amendments restructure sentence, remove “either” and “or”, and add “and” to change the Reading Instruction Competence Assessment from an option for the Single Subject Credential holder to a requirement. Added “, and” to allow for the addition of another subsection.

(c)(2)(D): Proposed new subsection to require individuals using the provisions of this section to hold an English Learner Authorization as found in Education Code Section 44253.3 or 44259.5.

(c)(3): Proposes changing “authorization” to “content area” to more accurately describe the item to be added.

(c)(3)(A): Proposes changing “completion” to “passage” since a passing score on exams must be achieved. Removed “either” and “or” since an additional option is added. Added “completion of” to clarify the item described as an option.

(c)(3)(B): Proposed new subsection to add the requirement of a pedagogy course in the specific content area to align more closely with current Commission-approved preparation program standards. Pedagogy courses from California institutions shall be accepted only if the institution has a Commission-approved program for the content area sought. Additional proposed language allows Commission-approved programs to grant equivalency to the pedagogy requirement for coursework completed at their institution to reduce the possibility of redundancy. States that pedagogy courses from outside of California shall only be accepted from regionally-accredited institutions with a professional teacher preparation program.

(c)(3)(B)(i) through (c)(3)(B)(iii): There are several content areas including science and mathematics in which there is only one pedagogy course in Commission-approved programs for all the subject areas within the broad content area and no additional pedagogy course is required.
Proposed new subsections outline exceptions to the pedagogy course required for adding a new content area to a clear Single Subject Credential to ensure an individual who has already completed the pedagogy in that area does not need to repeat the requirement. Due to the specialized preparation and specific pedagogy required, the World Language: English Language Development content area is not included with these exceptions.

(c)(3)(C): Proposed new subsection to require individuals using the provisions of this section to hold an English Learner Authorization as found in Education Code Section 44253.3 or 44259.5.

(c)(5): Proposes changing “authorization” to “content area” to more accurately describe the item to be added. Amendments to EC §44277 removed professional growth activities and successful service as renewal requirements for professional clear teaching credentials. As a result, the Commission discontinued issuance of “professional” clear credentials effective January 1, 2007. Therefore, the proposed amendments delete the references to professional clear credentials.

(d): Proposes changing “authorization” to “content area” to more accurately describe the item to be added. Proposes changing “and” to “or” as more accurate to avoid inferring the person will have to meet the requirements for all three subsections to obtain the additional content area.

(d)(1)(A): Proposes changing “completion” to “passage” since a passing score on exams must be achieved. Removed “either” and “or” since an additional option is added. Added “completion of” to clarify the item described as an option. Individuals who hold professional level departmentalized teaching credentials issued by another state will be evaluated under the provisions of 5 CCR §80413.3 when applying for a preliminary Single Subject Teaching Credential.

(d)(1)(B): Proposed amendments to add the requirement of a pedagogy course in the specific content area to align more closely with current Commission-approved preparation program standards. Pedagogy courses from California institutions shall be accepted only if the institution has a Commission-approved program for the content area sought. Additional proposed language allows Commission-approved programs to grant equivalency to the pedagogy requirement for coursework completed at their institution to reduce the possibility of redundancy. States that pedagogy courses from outside of California shall only be accepted from regionally-accredited institutions with a professional teacher preparation program.

(d)(1)(C): Proposes eliminating the word “and” to allow for the addition of another subsection.

(d)(1)(D): Proposes removing the “.” and adding “, and” to allow for the addition of another subsection.

(d)(1)(E): Proposed new subsection to require individuals using the provisions of this section to hold an English Learner Authorization as found in Education Code Section 44253.3 or 44259.5.

(d)(2)(A): Proposes changing “completion” to “passage” since a passing score on exams must be achieved. Removed “either” and “,” to correct the sentence. Removed “a Commission-approved subject-matter program” as this option is no longer available to obtain the Multiple Subject
Credentia. Individuals who hold professional level elementary education or self-contained credentials issued by another state will be evaluated under the provisions of 5 CCR §80413.3 when applying for a preliminary Multiple Subject Teaching Credential.

(d)(2)(B): Proposes the addition of language stating that pedagogy courses from California institutions shall be accepted only if the institution has a Commission-approved Multiple Subject preparation program. Additional proposed language states that pedagogy courses from outside of California shall only be accepted from regionally-accredited institutions with a professional teacher preparation program.

(d)(2)(C): Proposes changing “may” to “shall” to remove ambiguity regarding the requirement. Proposed amendments restructure sentence, remove “either” and “or”, and add “and” to change the Reading Instruction Competence Assessment from an option for the Single Subject Credential holder to a requirement.

(d)(2)(D): Proposes removing “.” and adding “, and” to allow for the addition of another subsection.

(d)(2)(E): Proposed new subsection to require individuals using the provisions of this section to hold an English Learner Authorization as found in Education Code Section 44253.3 or 44259.5.

(d)(3): Proposes changing “authorization” to “content area” to more accurately describe the item to be added. Proposed amendments reword this subsection to reorganize and clarify all items to be listed as requirements rather than options. Removed “one” and added “verifying all” to accommodate new subsections with additional requirements. Added phrase “that will be valid for five years from the original issuance date of the initial preliminary Single Subject Teaching Credential” to separate it from the individual qualifying requirements as the phrase applies to the entire subsection.

(d)(3)(A): Proposed amendments reword subsection to show reorganized format and clarify requirements. Removed the phrase “that will be valid for five years from the original issuance date of the initial preliminary Single Subject Teaching Credential” now contained in (d)(3) as the phrase applies to the entire subsection.

(d)(3)(B): Proposed amendments reword subsection to show reorganized format. Removes “It will be valid for two years from the original issuance date of the initial preliminary Single Subject Teaching Credential” as outdated language is no longer applicable. Proposes adding the requirement of a pedagogy course in the specific content area to align more closely with current Commission-approved preparation program standards. Pedagogy courses from California institutions shall be accepted only if the institution has a Commission-approved program for the content area sought. Additional proposed language allows Commission-approved programs to grant equivalency to the pedagogy requirement for coursework completed at their institution to reduce the possibility of redundancy. Pedagogy courses from outside of California shall only be accepted from regionally-accredited institutions with a professional teacher preparation program.
(d)(3)(B)(i) through (d)(3)(B)(iii): There are several content areas including science and mathematics in which there is only one pedagogy course in Commission-approved programs for all the subject areas within the broad content area and no additional pedagogy course is required. Proposed new subsections outlining exceptions to the pedagogy course required for adding a new content area to a preliminary Single Subject Credential to ensure an individual who has already completed the pedagogy in that area does not need to repeat the Due to the specialized preparation and specific pedagogy required, the World Language: English Language Development content area is not included with these exceptions.

(d)(3)(C): Proposes new subsection to specify the reading requirement that was previously listed in (d)(3)(A).

(d)(3)(D): Proposes new subsection to specify the U.S. Constitution requirement that was previously listed in (d)(3)(A).

(d)(3)(E): Proposes new subsection to require individuals using the provisions of this section to hold an English Learner Authorization as found in Education Code Section 44253.3 or 44259.5.

(d)(5): Proposes removing the phrase “with the exceptions described in (d)(3)” as the reorganization of the subsections have made this statement no longer applicable. Amendments to EC §44277 removed professional growth activities and successful service as renewal requirements for professional clear teaching credentials. As a result, the Commission discontinued issuance of “professional” clear credentials effective January 1, 2007. Proposes removal of “professional” since professional clear credentials are no longer issued. Removed “,” to correct grammar. Changed “authorization” to “or content area” to more accurately describe the item to be added.

(e): Proposes changing “by completion of either the appropriate subject-matter examination(s) adopted by the Commission, or a Commission-approved subject-matter program” to “pursuant to subsection (c)(1)(A) for the single subject teaching credential or subsection (c)(2)(A) for the multiple subject teaching credential” to allow for the additional options included to establish subject matter knowledge.

(f): Proposes adding “.” to end the sentence as it now reads. Proposes changing “by completion of either the appropriate subject-matter examination(s) adopted by the Commission, or a Commission-approved subject-matter program” to “Subject matter knowledge can be verified pursuant to subdivision (c)(1)(A) for the single subject teaching credential or (c)(2)(A) for the multiple subject teaching credential” to allow for the additional options included to establish subject matter knowledge.

(g): Proposes removing the information concerning assignment as it is an employment related issue that is not applicable to this section of regulations. Proposes adding language to allow possession of National Board Certification to be used to obtain a new teaching or content area under the provisions of this section as found in Education Code Section 44399.1.
(g)(1): Proposes new subsection to allow possession of National Board Certification to be used by the holder of a clear Multiple Subject Teaching Credential to obtain a clear Single Subject Teaching Credential under the provisions of this section as found in Education Code Section 44399.1.

(g)(2) and (g)(2)(A) through (g)(2)(B): Proposed new subsections to allow possession of National Board Certification to be used by the holder of a clear Single Subject Teaching Credential to obtain a clear Multiple Subject Teaching Credential under the provisions of this section as found in Education Code Section 44399.1.

(g)(3): Proposes new subsection to allow possession of National Board Certification to be used by the holder of a clear Single Subject Teaching Credential to obtain an additional single subject content area under the provisions of this section as found in Education Code Section 44399.1.

(h): Proposes new subsection to allow possession of National Board Certification to be used to obtain a new teaching or content area under the provisions of this section as found in Education Code Section 44399.1.

(h)(1): Proposes new subsection to allow possession of National Board Certification to be used by the holder of a preliminary Multiple Subject Teaching Credential to obtain a preliminary Single Subject Teaching Credential under the provisions of this section as found in Education Code Section 44399.1.

(h)(2) and (h)(2)(A) through (h)(2)(B): Proposed new subsections to allow possession of National Board Certification to be used by the holder of a preliminary Single Subject Teaching Credential to obtain a preliminary Multiple Subject Teaching Credential under the provisions of this section as found in Education Code Section 44399.1.

(h)(3): Proposes new subsection to allow possession of National Board Certification to be used by the holder of a preliminary Single Subject Teaching Credential to obtain an additional single subject content area under the provisions of this section as found in Education Code Section 44399.1.

(h)(4): Proposes new subsection to explain the renewal requirements associated with a preliminary teaching credential issued on the basis of NBC. There are many disparate routes available to earn a preliminary teaching credential that have specific requirements to qualify for the clear teaching credential. The renewal requirements for an individual issued a preliminary teaching credential under this subsection will be determined by Commission staff after reviewing the route by which the initial preliminary teaching credential was issued.

(i): Education Code Section 44274.2 allows individuals who hold professional level out-of-state teaching credentials to qualify for comparable California teaching credentials. However, individuals who already hold California life or clear teaching credentials and subsequently earn professional level out-of-state teaching credentials are often required to complete additional requirements, beyond the English learner authorization, before a clear credential may be issued in the new teaching or content area. This is especially true if an individual does not have at least
two years of out-of-state teaching experience or has not yet earned a master’s degree (or the equivalent). The proposed addition of this subsection is to preface the routes by which individuals who hold life or clear California Multiple or Single Subject Teaching Credentials may add another credential or content area based on possession of an out-of-state credential.

Individuals who hold California preliminary teaching credentials and subsequently earn professional level out-of-state teaching credentials will continue to be evaluated for a preliminary Multiple or Single Subject Teaching Credential pursuant to the provisions of subsections (a)(1) or (a)(2) of 5 CCR section 80413.3, as applicable.

(i)(1): Proposes new subsection to preface the requirements for the holder of a life or clear Multiple Subject Teaching Credential to earn a clear Single Subject Teaching Credential based on possession of an out-of-state credential.

(i)(1)(A): Proposes new subsection to describe the type of out-of-state departmentalized teaching credential required to qualify for a Single Subject Teaching Credential as an added authorization.

(i)(1)(B): Proposes new subsection to require individuals using the provisions of this section to hold an English Learner Authorization as found in Education Code Section 44253.3 or 44259.5.

(i)(2): Proposes new subsection to preface the requirements for the holder of a life or clear Single Subject Teaching Credential to earn a clear Multiple Subject Teaching Credential based on possession of an out-of-state credential.

(i)(2)(A): Proposes new subsection to describe the out-of-state elementary education or self-contained teaching credential required to qualify for a Multiple Subject Teaching Credential as an added authorization.

(i)(2)(B): Proposes new subsection to require individuals using the provisions of this section to hold an English Learner Authorization as found in Education Code Section 44253.3 or 44259.5.

(i)(3): Proposes new subsection to preface the requirements for the holder of a life or clear Single Subject Teaching Credential to earn a Single Subject Teaching Credential in a new content area based on possession of an out-of-state credential.

(i)(3)(A): Proposes new subsection to describe the out-of-state departmentalized teaching credential required to qualify for a Single Subject Teaching Credential in a new content area as an added authorization.

(i)(3)(B): Proposes new subsection to require individuals using the provisions of this section to hold an English Learner Authorization as found in Education Code Section 44253.3 or 44259.5.

Documents Relied Upon in Preparing Regulations:
August 2012 Commission agenda item 5D:
http://www.ctc.ca.gov/commission/agendas/2012-08/2012-08-5D.pdf
January 2013 Commission agenda item 3B:
March 2013 Commission agenda item 2A and insert:

Economic Impact Assessment/Analysis
Education Code section 44225 authorizes the Commission to adopt these proposed regulation
amendments. The proposed amendments implement, interpret, and make specific Education
Code sections 44225(e), 44274.2, and 44399.1 pertaining to adding a teaching or content area to a
general education credential.

The purpose of the proposed regulations amendments is as follows:
- Implement and clarify recent statutory changes
- General clean-up of section related to adding a teaching or content area to general
  education credentials to align with previous statutory and regulatory changes
- Implement pedagogy and reading as requested by the Commission
- Add English Learner requirement as requested by the Commission

In accordance with Government Code section 11346.3(b), the Commission has made the
following assessments regarding the proposed regulation amendments:

Creation or Elimination of Jobs Within the State of California
The proposed amendments pertain to teaching credentials that authorize service in California’s
public schools. The proposed amendments will not create or eliminate jobs in California.

Creation of New or Elimination of Existing Businesses Within the State of California
The proposed amendments pertain to teaching credentials that authorize service in California’s
public schools. The proposed amendments will not create or eliminate existing businesses in
California.

Expansion of Businesses or Elimination of Existing Businesses Within the State of California
The proposed amendments pertain to teaching credentials that authorize service in California’s
public schools. As a result of the proposed amendments, no existing businesses in California will
be expanded or eliminated.

Benefits of the Regulations
The Commission anticipates that the proposed amendments will benefit the welfare of students
attending public schools in the State of California by assuring appropriate preparation for
teachers seeking to teach a new content area outside of his/her initially credentialed area. The
proposed regulations will promote fairness and prevent discrimination by ensuring uniformity in
requirements for individuals serving on general education teaching credentials. The Commission
does not anticipate that the proposed regulations will result in the protection of public health and
safety, worker safety, or the environment, the prevention of social inequity or an increase in openness and transparency in business and government.

Consideration of Alternatives
In accordance with Government Code section 11346.5, subdivision (a)(13), the Commission must determine that no reasonable alternative considered by the agency or that has otherwise been identified and brought to the attention of the agency would be more effective in carrying out the purpose for which the action is proposed, would be as effective as and less burdensome to affected private persons than the proposed actions, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law. No alternatives have yet been proposed that will be less burdensome and equally effective.

These proposed regulations will not impose a mandate on local agencies or school districts that must be reimbursed in accordance with Part 7 (commencing with §17500) of the Government Code.

Evidence Relied Upon to Support the Initial Determination That the Regulation Will Not Have a Significant Adverse Economic Impact on Business: The proposed regulations will not have a significant adverse economic impact upon business. The proposed regulations apply only to individuals seeking teaching credentials that authorize service in California’s public schools.